

MORRIS, NICHOLS, ARSHT & TUNNELL

1201 NORTH MARKET STREET  
P.O. Box 1347  
WILMINGTON, DELAWARE 19899-1347

302 658 9200  
302 658 3989 FAX

WILLIAM M. LAFFERTY  
302 575 7341  
302 425 4679 FAX  
wlafferty@mnat.com

June 30, 2005

**VIA E-FILING**

The Honorable Gregory M. Sleet  
United States District Court  
District of Delaware  
844 North King Street  
Wilmington, Delaware 19801

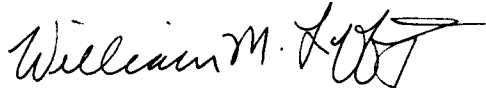
Re: *Davis Int'l, LLC, et al. v. New Start Group Corp., et al.*, Case No. 04-1482-GMS

Dear Judge Sleet:

As counsel for defendant Evraz Holding in the above-referenced matter, I write to report to Your Honor that the plaintiffs in this action have started yet another lawsuit involving the same allegations as here. This new action, filed in Luxembourg against Evraz Group S.A., underscores the need for an injunction to stop the plaintiffs from harassing the defendants and burdening the courts with a never-ending flood of lawsuits about matters that should be – and in large part have been – adjudicated in Russia.

In Luxembourg, the plaintiffs are demanding that the court escrow shares of GOK, the Russian company whose shares are at issue in the action here. The Luxembourg court has indicated that it will attempt to issue a ruling on this request as early as July 1, and we will report to the Court when we receive that ruling.

Respectfully,



William M. Lafferty (Del. Bar No. 2755)

cc. Dr. Peter T. Dalleo, Clerk  
Charles M. Oberly, Esq.

Karen V. Sullivan, Esq.  
Lisa C. Cohen, Esq.  
Lawrence S. Goldman, Esq.  
Elizabeth Johnson, Esq.  
Richard J. Schaeffer, Esq.  
Peter J. Venaglia, Esq.  
Laura D. Sullivan, Esq.  
Kevin F. Brady, Esq.  
Rodney F. Page, Esq.  
Michael G. Biggers, Esq.  
David H. Herrington, Esq.  
Vitali Rosenfeld, Esq.  
Richard I.G. Jones, Jr., Esq.  
Joel B. Kleinman, Esq.  
Steven J. Roman, Esq.  
David H. Greenberg, Esq.  
William H. Devaney, Esq.  
Brian Maas, Esq.  
Paul R. Grand, Esq.  
Edward M. Spiro, Esq.  
David L. Finger, Esq.  
Bruce S. Marks, Esq.